



October 17, 2000

Walt Rosenbusch  
Director, Minerals Management Service  
US Department of the Interior  
Mail Stop 4024  
381 Elden Street  
Herndon, Virginia 20170-4814  
Attention: Rules Processing Team

RULES PROCESSING TEAM

OCT 17 2000

RE: Minerals Management Service Proposed Rule, Outer  
Continental Shelf Oil and Gas Leasing. 65 FR 55476-  
55489, September 14, 2000.

Dear Walt:

The National Ocean Industries Association (NOIA) would like to offer an additional comment on the above referenced proposal. Our comment concerns Section 260.303 (d) (What are the joint bidding requirements?) of the MMS proposed rule.

The definition of a person should be clarified so that it does not include affiliate companies for purposes of joint bidding. Further, the proposed rule should be clarified so that agreements between persons on the restricted bidders list may be entered into after the lease sale. As currently worded, the proposed rule would not allow post-lease agreements (e.g. unitization, farm outs, property sales) that are allowed today and are necessary to encourage the efficient development of resources.

We encourage the MMS to clarify Section 260.303 (d) by inserting after the word "agreement" the words "prior to a lease sale."

Thank you, for your consideration of our comment.

Sincerely,

Robert J. Moran  
Director, Government Affairs

1120 G Street, NW, Suite 900, Washington, DC 20005